

1 John W. O'Leary, WSBA #33004  
Gravis Law, PLLC  
2 601 W. Kennewick Avenue  
Kennewick, WA 99336  
3 (509) 588-0431 / (866) 419-9269 fax  
[JOLeary@gravislaw.com](mailto:JOLeary@gravislaw.com)  
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5  
6 UNITED STATES BANKRUPTCY COURT  
7 EASTERN DISTRICT OF WASHINGTON  
8

9 In re: ) Case No. 18-03197-FPC11  
10 GIGA WATT INC, ) MOTION AND NOTICE TO LIMIT  
11 Debtor. ) NOTICE OF MOTION TO WITHDRAW  
12 ) AS COUNSEL OF RECORD AND  
NOTICE THEREOF

13 Come now William L. Hames and John W. O'Leary of Gravis Law, PLLC, (the "Firm")  
14 attorneys of record for creditor Chelan Douglas Regional Port Authority, formerly the Port of  
15 Douglas County (the "Port"), former landlord of Debtor herein, and hereby requests the court's  
16 authorization to limit notice of their Motion to Withdraw as Counsel of Record and Notice  
17 Thereof filed simultaneously herewith. The Firm seeks to limit notice to the following:

- 18 a) Chapter 11 Trustee  
19 b) the US Trustee's office,  
20 c) Benjamin A. Ellison, on behalf of the unsecured creditors' committee,  
21 d) All parties receiving ECF notice and  
22 e) the 20 largest creditors as designated on the Debtor's schedules

23 The Chapter 11 Trustee and the unsecured Creditors' Committee are both represented by  
24 counsel. The Firm submits that limiting notice will not prejudice any creditor. Further, the costs  
25 of serving all creditors in this case would be prohibitive.

MOTION AND NOTICE TO LIMIT NOTICE OF  
MOTION TO WITHDRAW AS COUNSEL OF  
RECORD AND NOTICE THEREOF - 1

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1 LBR 2002-1 permits less inclusive notice to be given “if not prohibited by the Code or  
2 Rules, and specifically allowed by the Court...” LBR 2002-1(b)(1)(B). The Firm is not aware  
3 of any specific prohibitions against the court entering an order permitting limitation of notice as  
4 requested herein and submits that good cause exists for so doing.

5 **NOTICE**

6 **IF YOU OBJECT TO THE RELIEF REQUESTED ABOVE, YOU MUST FILE A**  
7 **WRITTEN OBJECTION WITH THE CLERK OF THE ABOVE-ENTITLED COURT**  
8 **AND REQUEST A HEARING AT P.O. BOX 2164, W. 904 RIVERSIDE, ROOM 321,**  
9 **SPOKANE, WASHINGTON 99210, ON OR BEFORE 17 DAYS (14 DAYS PLUS 3 DAYS**  
10 **FOR MAILING) FROM THE DATE OF THIS NOTICE AND SERVE A COPY ON**  
11 **THE UNDERSIGNED AT 601 W. KENNEWICK AVENUE, KENNEWICK,**  
12 **WASHINGTON 99336; MARK WALDRON, CHAPTER 11 TRUSTEE, AT 6711**  
13 **REGENTS BOULEVARD WEST, SUITE B, TACOMA, WA 98466; AND UPON THE**  
14 **OFFICE OF THE UNITED STATES TRUSTEE, 920 W. RIVERSIDE, STE. 593,**  
15 **SPOKANE, WA 99201.**

16 **SHOULD YOU FAIL TO OBJECT AS SET FORTH ABOVE, PLEASE**  
17 **FURTHER BE ADVISED THAT THE RELIEF REQUESTED MAY BE GRANTED**  
18 **WITHOUT FURTHER NOTICE TO YOU.**

19 DATED this 12<sup>th</sup> day of October 2021.

20 GRAVIS LAW, PLLC  
21 Attorneys for creditor Chelan Douglas Regional  
22 Port Authority, formerly the Port of Douglas  
County

23 BY: /s/ John W. O'Leary  
24 JOHN W. O'LEARY, WSBA #33004  
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MOTION AND NOTICE TO LIMIT NOTICE OF  
MOTION TO WITHDRAW AS COUNSEL OF  
RECORD AND NOTICE THEREOF - 2

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8 UNITED STATES BANKRUPTCY COURT  
9 EASTERN DISTRICT OF WASHINGTON  
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11 In re:

12 GIGA WATT INC,

13 Debtor.  
14

) Case No. 18-03197-FPC11  
)  
)

) [PROPOSED] ORDER LIMITING NOTICE  
) OF MOTION TO WITHDRAW AS  
) COUNSEL OF RECORD AND NOTICE  
) THEREOF  
)

15 This matter having come before the above-entitled court on the motion of William L.  
16 Hames and John W. O’Leary of Gravis Law, PLLC, to limit notice of their Motion to Withdraw  
17 as Counsel of Record for creditor Chelan Douglas Regional Port Authority, formerly the Port of  
18 Douglas County (the “Port”), and the court finding that good cause exists to grant the relief  
19 requested, NOW, THEREFORE,

20 IT IS HEREBY ORDERED, ADJUDGED AND DECREED the counsels’ motion is  
21 granted.

22 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that notice of William L.  
23 Hames, John W. O’Leary and Gravis Law, PLLC’s Motion to Withdraw as Counsel of Record  
24 may be limited to:

25 a) Chapter 11 Trustee;

ORDER LIMITING NOTICE OF MOTION TO  
WITHDRAW AS COUNSEL OF RECORD AND  
NOTICE THEREOF - 1

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- 1           b) Office of the US Trustee;  
2           c) The Unsecured Creditor's Committee;  
3           d) All parties receiving ECF notice; and,  
4           e) 20 largest creditors as listed on Debtor's schedules.

5                               /// END OF ORDER ///

6 Presented by:

7 GRAVIS LAW, PLLC  
8 Attorneys for Creditor Chelan Douglas  
9 Regional Port Authority, formerly the  
Port of Douglas County

10 By: \_\_\_\_\_  
11 JOHN W. O'LEARY, WSBA #33004

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ORDER LIMITING NOTICE OF MOTION TO  
WITHDRAW AS COUNSEL OF RECORD AND  
NOTICE THEREOF - 2

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